

EPA Jacket 5481-498

Vol.1

1-NAPHTHALENEACETIC ACID TECHNICAL

FOR MANUFACTURING/FORMULATING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid 99.0%

OTHER INGREDIENTS: 1.0%

TOTAL 100.0%

EPA Reg. No. 5481-498

EPA Est. 5481-CA-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE

WEAR SAFETY GOGGLES WHEN HANDLING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
www.amvac-chemical.com
1-888-462-6822

NET CONTENTS:
LBS.

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams, or ponds. Do not contaminate water by the cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This Manufacturing-Use product may only be used for formulating plant growth regulator end-use pesticides containing sodium, potassium or ammonium salts of 1-naphthaleneacetic acid; or containing the ethyl ester of 1-naphthaleneacetic acid; or containing 1-naphthaleneacetamide. Formulators using this product are responsible for obtaining EPA registrations for their formulated products as appropriate for their intended uses.

FOR MANUFACTURING USE ONLY

This technical material may only be used to product formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for formulation into a plant growth regulator for (1) The following uses: apples, cherries, olives, oranges, pears, pineapples, quinces, tangerines (mandarins), tangelos, tangors, and non-food uses; (2) Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty container by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of container in a sanitary landfill or by incineration if allowed by state and local authorities. If product is packaged in an inner container with an outer drum overpack and the drum is contained and cannot be reused, dispose of the drum in the same manner.

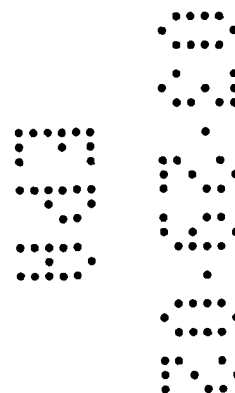
LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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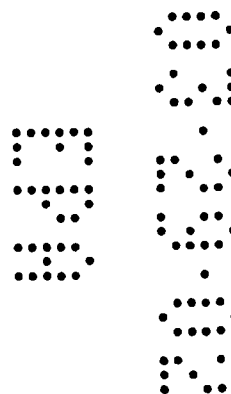
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Ruby Whitters

10/23/01 10:18 AM

To: Diane Isbell/DC/USEPA/US@EPA, Denise
Greenway/DC/USEPA/US@EPA, Glenn
Williams/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
cc: Sherri Street/DC/USEPA/US@EPA, Margaret
Rice/DC/USEPA/US@EPA, Janet Andersen/DC/USEPA/US@EPA,
Richard Keigwin/DC/USEPA/US@EPA
Subject: FOIA Request for Report Cards on naphthaleneacetic acid

Hello,

This is a follow-up to my E-mails sent previously requesting copies of the most recent reregistration status report cards for the following chemicals:

Chemical	A.I. No.
Naphthaleneacetic acid, potassium salt	56003
Naphthaleneacetic acid	56002
Naphthaleneacetic acid, sodium salt	56007
Naphthaleneacetic acid, ammonium salt	56004
Naphthaleneacetamide	56001
Naphthaleneacetic acid, ethyl ester	56008

It appears from talking to you that these records does not exist. Considering this, I will be bringing this case to closure allowing the Requestor appeal rights.

Ruby



John

04 September, 2001

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Advisement of Quality Control Test Results of NAA Product at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998, (Luis Suguiyama) this is to advise EPA of quality control test results of product at a bonded warehouse (EPA Est. No. 5481-CA-03). As indicated on the attached report, all three batches from shipment number ten of 1-Naphthalene acetic acid (NAA) technical grade product have been tested and found to be in compliance with the approved Confidential Statement of Formula. The Notice of Arrival documents will be forwarded to EPA under separate cover.

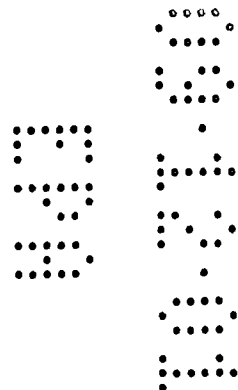
It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.


Sincerely,


A handwritten signature in cursive script that reads 'Jon C. Wood'.

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)




 Cynthia Giles-Parker
10/25/99 02:07 PM

To: Denise Greenway/DC/USEPA/US@EPA
cc: Luis Suguiyama/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
Subject: Re: AMVAC 

Denise,
I believe that it is appropriate to send the reports directly to BPPD. RD was listed as the contact at that time because of the uncertainty about when the chemical would be transferred and who would be the contact. RD is not actively doing anything with this chemical since the transfer to BPPD.

Denise Greenway

 Denise Greenway
10/25/99 01:59 PM

To: Luis Suguiyama/DC/USEPA/US@EPA, Cynthia Giles-Parker/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
cc:
Subject: AMVAC

Jon Wood has pointed out that he is sending the NAA QA/QC reports required by EPA as part of the "fitness" to hold a pesticide registration agreement to RD. Is it allowed under that agreement for those reports to be sent directly to BPPD now, since the ai has been transferred to us from RD? It would seem more efficient, and spare John from hand-delivering them (although I do enjoy his visits!). I did not want to ask Mr. Wood to send them to BPPD in case that would somehow violate the terms of your hard-won agreement. Should he continue directing them to RD, or start sending them here?

Thanks for your help!



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 18 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Transfer of the Active Ingredient 1-Naphthaleneacetic Acid, and its Salts and Esters, from the Biopesticides and Pollution Prevention Division to the Registration Division and the Special Review and Reregistration Division

FROM: Janet L. Andersen, Director
Biopesticides and Pollution Prevention Division (7511C)

TO: James Jones, Director
Registration Division (7505C)

Lois Rossi, Director
Special Review and Reregistration Division (7508C)

and

Richard Schmitt, Director
Information Resources and Services Division (7502C)

In January of 1999, the Biopesticides and Pollution Prevention Division (BPPD) accepted responsibility for 1-naphthaleneacetic acid (NAA) and its salts and esters. BPPD agreed to take the registration work and the development of the RED because we all believed these active ingredients would be similar to the other plant growth regulators in BPPD purview. However, as BPPD initiated activities for the RED, we determined that a positive oncogenicity study (preliminary decision) exists for 1-naphthalenacetic acid, sodium salt (PC code 056007). Unlike other plant regulators managed by BPPD, NAA active ingredients cannot be classified as biochemicals because they are not naturally occurring and they have toxic endpoints inappropriate for our review. We believe NAA will need to go through the HED cancer review process to be properly evaluated. For these reasons, the transfer of the NAA active ingredients from BPPD to RD and SRRD was recommended by Acting Deputy Office Director, Susie Hazen.

2/23/00

To help facilitate this transition, we have provided a listing of the active ingredients and their PC codes. All of the jackets for NAA products have been returned to the file room. We have prepared packages for RD to assist the PM taking over the regulatory actions and for SRRD to assist the CRM taking over the RED action. Denise Greenway (308-8263) is preparing a list of pending actions and is willing to assist the PM to understand the status and issues regarding the pending actions. Dick King (308-8052) will assist the CRM and Roger Gardner (308-8268) will be glad to help the HED scientists understand what has been reviewed to date and what has been learned from that material.

In addition, BPPD requests that IRSD change the PPIS/REFS and PRATs data bases as soon as possible to reflect this transfer of NAA active ingredients and the associated products and pending products.

You may wish to have your Branch Chiefs contact Sheryl Reilly, Acting Branch Chief for the Biochemical Pesticides Branch at 308-8269.

Attachment

ATTACHMENT

Listing of Active Ingredients:

PC code 056001	1-Naphthaleneacetamide
PC code 056002	1-Naphthaleneacetic acid
PC code 056003	Potassium 1-naphthaleneacetate
PC code 056004	Ammonium 1-naphthaleneacetate
PC code 056005, no active products	2-Methyl-1-naphthaleneacetic acid
PC code 056006, no active products	2-Methyl-1-naphthaleneacetamide
PC code 056007	Sodium 1-naphthaleneacetate
PC code 056008	Ethyl 1-naphthaleneacetate
PC code 589300, no active products	1-Naphthaleneacetic acid, methyl ester

For the RD weekly
Ca. Feb./Mar., 2000

Naphthaleneacetic Acid and Salts (NAA) to return to RD an SRRD

A meeting was held between RD and BPPD on March 15 to discuss the details of an immediate return of the registration aspects of NAA to RD by BPPD. It was also confirmed that reregistration aspects of NAA will be given to SRRD. Transfer of NAA to BPPD occurred about a year ago because NAA is a close analog of naturally occurring plant hormones (auxins). However, BPPD has since decided that NAA appears to have toxicology problems and so is not suitable for their type of processing. BPPD is completing a number of NAA Actions that they have in-house and have already initiated work on. Those Actions on which work has not yet begun have been retrieved and work initiated on them by Fungicide Branch.

to Cheryl 2/25/00

Meeting w/ BPPD on NAA Transfer

3/15/2000

BPPD: Cheryl Reilly, Denise Greenway
RD: Cynthia Giles-Parker, John Bazwin, Jr.

① • 72639-T LT Biosyn (Cub. & Rose) 11/99 RD gets into review pronto
~~new prod appl NAA mixed w/ 134 and 2 other a/s~~
~~NO JACKET, 2 data volumes~~ → ~~Pacllobutrazole~~
~~Bensulfuron~~

• 72639-E LT Biosyn (Cub. & Rose) 8/99 RD gets into review pronto
new prod appl NAA alone (technical)
WITH JACKET, 3 data volumes
returned to Biosyn 3/16/00

Ruby → • 64864-LN PACE Int'l (Hathorn) 12/99
Whiters
(FOIA) has new prod appl NAA tech
the jacket NO JACKET, 2 data volumes

• 70166-8 Sundance (Bany) 3/99 RD gets into review pronto
amendment to revise label's apple thinning directions
NO JACKET amendment appears inappropriate - lacks entire proposed label

• 5481-473 AMVAC (Wood) 3/99
update CSF to correct ingredient % and add TGA source
NO JACKET

• 5481-413 } AMVAC 3/99
5481-414 } update CSFs as above
NO JACKET

• 5481-452 AMVAC 5/99
update CSF per formaldehyde registration std (!)
NO JACKET

• 5481-459 AMVAC 5/99

update CSF per formaldehyde registration std.
NO JACKET

• 5481-460 AMVAC 5/99

update CSF per formaldehyde reg. std.
NO JACKET

*Note label indicated in separate SRA letter that 5481-343 also needed form CSF change. No Record *

• 5481-426 AMVAC 12/98

correct CSF by entry of wetting agent name NOTIFICATION
NO JACKET

• 5481-423 AMVAC 7/99

NOTIFICATION re: alternate brand name
NO JACKET

• 5481-429 AMVAC 1/00

NOTIFICATION of label updates per PR 98-10
NO JACKET

• 5887-169 VERDANT ^{Clark/}(Fresh) 11/99

NOTIFICATION of alt. source of oil
NO JACKET

• 5887-169 Verdant (Stacy Hortis) 2/00

request for copy of label stamped in Nov 1991 for Cal EPA.
JD & I agree that this will require a label review unless a legible
copy can be found in jacket. last label in jacket is Nov 1994

From Dick Area

• AMVAC 10/99 QC test results re bonded warehouse

• AMVAC 6/99 Notice of Arrival @ bonded warehouse

• AMVAC 6/99 QC test results re bonded warehouse

• SUNDANCE D252189 QC test results for Review!

• AMVAC 1/99 Notice of Arrival of NAA prod @ bonded warehouse

• AMVAC 7/99 QC test results re bonded warehouse

• AMVAC 2/99 Notice of Arrival @ bonded warehouse

• Sundance bonded warehouse related - partially accepted
see JB note re should these submissions be 86-5 screened at all?


[• for Sundance (Boone) notice of alt method]

• 1st Notification of arrival of NAA shipment D252189

Will transfer to RD immediately; RD will have
TRB review one or two.



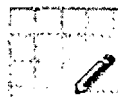
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Ca. Feb./Mar., 2000

Naphthaleneacetic Acid and Salts (NAA) to return to RD an SRRD

A meeting was held between RD and BPPD on March 15 to discuss the details of an immediate return of the registration aspects of NAA to RD by BPPD. It was also confirmed that reregistration aspects of NAA will be given to SRRD. Transfer of NAA to BPPD occurred about a year ago because NAA is a close analog of naturally occurring plant hormones (auxins). However, BPPD has since decided that NAA appears to have toxicology problems and so is not suitable for their type of processing. BPPD is completing a number of NAA Actions that they have in-house and have already initiated work on. Those Actions on which work has not yet begun have been retrieved and work initiated on them by Fungicide Branch.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 20, 2001

Mr. Jon C. Wood
Regulatory Manager
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Mr. Wood:

Subject: Transfer of Pesticide Registrations From
Company Number 64864 to Company Number 5481

Pursuant to your request in your letter and transfer agreement of May 23, 2001, we have approved the transfer of the following registrations from **Pace International, LLC**, company number **64864**, to **AMVAC Chemical Corporation**, company number **5481**.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
SNAAP 2	64864-52	5481-496
SNAAP 8	64864-51	5481-497
NAA Acid Technical	64864-50	5481-498

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.


In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact me at (703) 305-6474.

Sincerely,



Donna G. Parker
Information Management Specialist
Information Services Branch
Information Resources & Services Div. (7504C)

cc: Mr. George Lobisser
Manager and CEO
Pace International, LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

64864-50

Date of Issuance:

JUN 20 2000

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

1-Naphthaleneacetic
Acid Technical

Name and Address of Registrant (include ZIP Code):

Scott Hathorn III
Pace International
1011 Western Ave, Suite 505
Seattle, WA 98104

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

2. Make the following label changes before you release the product for shipment:

a. Revise the EPA Registration Number to read, "EPA Reg. No. "64864-50.

Signature of Approving Official:

Cynthia Giles-Parker
Fungicide Branch (PM22)
Registration Division (7505C)

Date:

JUN 20 2000

1-NAPHTHALENEACETIC ACID TECHNICAL

FOR MANUFACTURING/FORMULATING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid..... 99.0%

OTHER INGREDIENTS:..... 1.0%

TOTAL 100.0%

EPA Reg. No. 64864-LN

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE

WEAR SAFETY GOGGLES WHEN HANDLING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

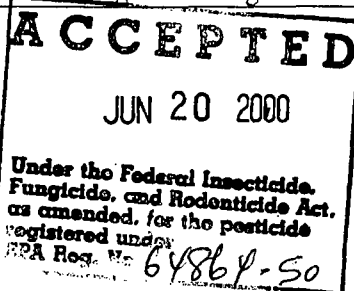
FIRST AID

IF IN EYES	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice
IF SWALLOWED	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Manufactured by:
Pace International, LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104



NET CONTENTS
_____ Lbs.

3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Carl S. Noble for
Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams, or ponds. Do not contaminate water by the cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This Manufacturing-use Product may only be used for formulating plant growth regulator end-use pesticides containing Sodium, Potassium or Ammonium Salts of 1-Naphthaleneacetic Acid; or containing the Ethyl Ester of 1-Naphthaleneacetic Acid; or containing 1-Naphthaleneacetamide. Formulators using this product are responsible for obtaining EPA registrations for their formulated products as appropriate for their intended uses.

FOR MANUFACTURING USE ONLY

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation into a Plant Growth Regulator for (1) The Following Uses: Apples, Cherries, Olives, Oranges, Pears, Pineapples, Quinces, Tangerines (Mandarins), Tangelos, Tangors, and non-food uses. **(2) Uses for Which USEPA has Accepted the Required Data and/or Citations of Data that the Formulator has Submitted in Support of Registration; and (3) Uses for Experimental Purposes that are in Compliance with USEPA Requirements.**

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty container by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of container in a sanitary landfill or by incineration if allowed by state and local authorities. If product is packaged in an inner container with an outer drum overpack and the drum is contaminated and cannot be reused, dispose of the drum in the same manner.

NOTICE TO BUYER

Pace International LLC warrants that this product conforms to the chemical description on its label and is reasonably fit for the purposes stated on its label, when used under normal conditions of use. Pace International LLC is not responsible for the use of this product contrary to its label directions, precautionary statements, or under atypical conditions not reasonably foreseeable by the Manufacturer and/or Seller. Nor shall Pace International be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be the sole legal responsibility of the Buyer.

Except as expressly provided herein with regard to this product, Pace International LLC makes no warranties, guarantees or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, including but not limited to merchantability, fitness for use or eligibility for trade usage. Buyer's or User's exclusive remedy, and Pace International LLC's total liability shall be for damages not exceeding the cost of the product.

1-NAPHTHALENEACETIC ACID TECHNICAL

FOR MANUFACTURING/FORMULATING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid..... 99.0%

OTHER INGREDIENTS:..... 1.0%

TOTAL 100.0%

EPA Reg. No. 64864-50

EPA Est. No. 73105-CHN-001

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE

WEAR SAFETY GOGGLES WHEN HANDLING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

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NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Manufactured by:
Pace International, LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

6-30-2000

NET CONTENTS
..... Lbs.

ENVIRONMENTAL HAZARDS

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STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

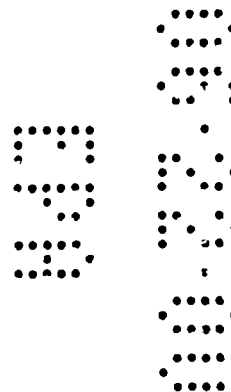
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Except as expressly provided herein with regard to this product, Pace International LLC makes no warranties, guarantees or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, including but not limited to merchantability, fitness for use or eligibility for trade usage. Buyer's or User's exclusive remedy, and Pace International LLC's total liability shall be for damages not exceeding the cost of the product.



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

March 23, 2000

Ms. Cynthia Giles-Parker
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505C)
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Letter of Authorization

Dear Ms. Giles-Parker,

Please let this letter serve to notify you that Pyxis Regulatory Consulting is authorized to represent Pace International, LLC. (Company Number 64864) before the US Environmental Protection Agency in all matters regarding our registrations and applications for registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 USC Section 136 et seq.

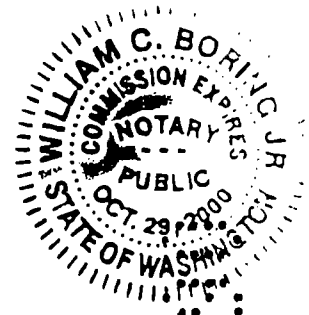
If you have any questions, please do not hesitate to contact me.

Sincerely,



Gene Brandli
Director, Product Development and Regulatory Affairs

cc: Janelle Whitehouse, Pyxis Regulatory Consulting



Sworn to before me

This 23 day of March, 2000.

William C. Boring, Jr.

At Seattle, Washington

My notary expires on 10/29/2000.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

08/May/2000
MEMORANDUM

Subject: Similarity Clinic for 1-Naphthaleneacetic Acid Technical
EPA Reg. No.: 64864-LN
DP Barcode: D265120
Case No: 056002

From: John C. Redden, Team Leader
Technical Review Branch
Registration Division (7505C) *SCR*

To: John Bazuin, PM Team 22
Fungicide Branch
Registration Division (7505C)

Applicant: Pace International, LLC
1011 Western Avenue, Suite 505
Seattle, Washington 98104

ACTION REQUEST:

Is EPA Reg. No. 64864-LN substantially similar to EPA Reg. No. 5481-430?

RECOMMENDATIONS:

The TRB Similarity Clinic has reviewed the CSF for EPA Reg. No. 64864-LN and compared it to the CSF for EPA Reg. No. 5481-430. The Clinic determined that EPA Reg. No. 64864-LN is substantially similar to EPA Reg. No. 5481-430. TRB recommends that labeling for EPA Reg. No. 5481-430 be used for EPA Reg. No. 64864-LN.

The TRB Similarity Clinic did not determine if this technical was produced from a registered source product. TRB recommends that the PM determine if this new technical was produced from a registered source.

This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product(s) from an acute toxicological viewpoint. For the purposes of this action, TRB has made no determination of the adequacy of the toxicological data base or the precautionary label of the cited product(s).

DATE OUT: 15 May 2000

SUBJECT: EP [x] MP [] PRODUCT CHEMISTRY REVIEW

DP BARCODE No.: D265117

REG./File Symbol No.: 64864-LN

PRODUCT NAME: 1-Naphthaleneacetic Acid

COMPANY: Pace International LLC

TO: PM #22, Cynthia Giles-Parker/John Bazuin
Fungicide Branch
Registration Division (7505C)

FROM: Bruce F. Kitchens, Chemist
Technical Review Branch
Registration Division (7505C)

Bruce F. Kitchens
15 May 2000

INTRODUCTION:

The registrant, Pace International LLC, is submitting an application for the registration of the new manufacturing-use product, 1-Naphthaleneacetic Acid Technical. The active ingredient in this product is 1-naphthaleneacetic acid at 99% active ingredient and is intended for formulating end-use products. In addition, the registrant states that this product is substantially similar to EPA Reg. No. 5481-430. In support of this request, the registrant has submitted a basic Confidential Statement of Formula (CSF) dated 29 Dec 1999, a draft label, and product chemistry data contained in MRID #s 450098-01, -02, and 470228-04. The Technical Review Branch (TRB) has been asked to review this submission.

SUMMARY OF FINDINGS:

TRB has reviewed this submission and reports the following findings:

- The nominal concentration listed on the draft label and the CSF are the same.
- The draft label contains the appropriate storage and disposal statements.
- The certified limits as proposed on the CSF are acceptable.
- The proposed product and the referenced product have the same active ingredient. The certified limits vary slightly; however, the differences fall within the

permitted Agency variations as specified in 40 CFR 158.175 for certified limits.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

- This submission meets the data requirements as specified in 40 CFR 158.155, 158.160, 158.162, 158.167, 158.175, and 158.180 with respect to product identity and composition, description of materials used to produce the product, description of production process, discussion of formation impurities, certified limits, and enforcement analytical method.
- This submission satisfies the data requirement as specified in 40 CFR 158.190 with respect to physical and chemical characteristics. The data requirements with respect to Oxidation/Reduction:Chemical Incompatability (830-6314) and Corrosion Characteristics (830-6320) remain outstanding.
- This product has been found to be substantially similar to EPA Reg. No. 5481-430 from a product chemistry standpoint only.

EP [] MP [x] PRODUCT CHEMISTRY REVIEW

1. DP BARCODE No.: D265117 2. REG./File Symbol No.: 64864-LN
3. Registration [x] 4. Reregistration [], Rereg Case No. _____
5. Product Name: 1-Naphthaleneacetic Acid Technical
6. Pesticide Type: Fungicide [] Herbicide []
Insecticide [] Rodenticide [] Antimicrobial []
Plant Growth Regulator [x] Others: _____
7. Uses: Food [] Non food use [x]
8. Type of Submission: New [x] Resubmission [] Amendment []
"ME-TOO" [x] Alternate Formulation [] Repack []
Experimental Use Permit [] Other (Specify) _____
9. If "Me-TOO" Registration, this product is [x] is not []
similar or substantially similar to EPA's Reg. No.: 5481-430,

If not, comment in Confidential Appendix A on the differences
between the registered and the new source where significant.

CONFIDENTIAL STATEMENT OF FORMULA, DATED 29 Dec 1999:

10. Type of formulation and the sources of active ingredients:
 - a. Non-integrated formulation system.....[]
 - b. Are all technical grade active ingredients used
registered? yes [] no [x]
 - c. Integrated formulation system.....[x]
11. Composition: The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

Active ingredient(s)	NC	% by weight	
		UCL	LCL
1-Naphthaleneacetic acid	99.0	99.8	96.0

12. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:

yes ☒ no ☐

13. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:

yes ☒ no ☐

14. Clearance of intentionally added ingredients in the formulation for the intended use:

- a. Formulation intended for food use under 40CFR§180.1001:

yes ☐ no ☒ Some are cleared, others are not ☐

Cleared under list: c ☐ d ☐ e ☐

- b. Formulation intended for non-food use:

yes ☒ no ☐ Some are cleared, others are not ☐

15. For products produced by an integrated formulation system:
All impurities of toxicological significance have an UCL:

yes ☐ no ☐ not applicable ☒

All other impurities 0.1% associated with the active ingredient in the product are reported at their nominal concentrations:

yes ☒ no ☐ not applicable ☐

PRODUCT LABEL, EPA RECEIVED (draft):

16. The active ingredients statement (chemical identities, nominal concentrations) is consistent with the CSF yes ☒ no ☐

17. The formulation contains one of the following:

10% or more of a petroleum distillate:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
1% or more of methyl alcohol:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
sodium nitrite at any level:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
a toxic List 1 inert at any level:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
arsenic in any form:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>

18. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?

yes [] no [] not applicable [x]

19. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:

yes [] no [] not applicable [x]

20. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses:

yes [x] no []

PRODUCT CHEMISTRY DATA (GROUP A)

<u>21. Chemical IDs/Manufacture/ Analytical Information</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830-1550 Chemical Identity	Y	450098-01
830-1600 Description of Materials Used to Produce the Product	Y	"
830-1620 Description of Production Process	Y	"
830-1650 Description of Formulation Process	NA	
830-1670 Discussion of Impurities	Y	450098-01
830-1700 Preliminary Analysis	Y	450098-02
830-1750 Certified Limits	Y	450098-02
830-1800 Enforcement Analytical Method	Y	"

PRODUCT CHEMISTRY DATA (GROUP B)

<u>24. Physical/Chemical Properties</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitative Description</u>	<u>MRID No.</u>
830-6302 Color	Y	white	470228-04
830-6303 Physical State	Y	amorphous or crystalline solid	"
830-6304 Odor	Y	odorless	"
830-6314 Oxidation/Reduction:Chemical Incompatability	G		
830-6315 Flammability/Flame Extension	NA		
830-6316 Explodability	NA		
830-6317 Storage Stability of Product	NR	see PR-Notice 92-5	470228-04
830-6319 Miscibility	NA		
830-6320 Corrosion Characteristics	G		
830-6321 Dielectric Breakdown Constant	NA		
830-7000 pH	Y	3.45 (1% slurry)	470228-04
830-7100 Viscosity	NA		
830-7300 Density	Y	3.75 lb/gal	470228-04

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

450098-00

1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

HAND DELIVERED TO:

Document Processing Desk (7504C) -- (APPL.)
Office of Pesticide Programs
U.S. ENVIRONMENTAL PROTECTION AGENCY
Crystal Mall Building II
1921 Jefferson Davis Highway, Room 266-A
Arlington, VA 22202

December 30, 1999

Ms. Sheryl Reilly, Acting Chief & Product Manager (PM-91)
Biochemicals Pesticides Branch
Biopesticides and Pollution Prevention Division (BPPD)

**RE: Application for Section 3 Registration of:
1-Naphthaleneacetic Acid Technical (TGAI/MUP)**

Dear Ms. Reilly:

Enclosed in support of our proposed registration of 1-Naphthaleneacetic Acid Technical (TGAI/MUP), a biochemical plant growth regulator, are the following:

- EPA Application for Pesticide Registration [Form 8570-1 (Rev. 3-94)]
- Five (5) copies of pour draft labeling
- Confidential Statement of Formula [Form 8570-4 (Rev. 8-94)]
- Certification of Accuracy of Product Certified Limits
- Certification with Respect to Citation of Data [Form 8570-34 (9-97)]
- Copy of PACE's Offer to Pay Letter to the only company listed on EPA's Data Submitter's List ((9/30/99) for 1-Naphthaleneacetic Acid Technical
- Data Matrix, Public File Copy [Form 8570-35 (9-97)]
- Data Matrix, Agency Internal Use Copy [Form 8570-35 (9-97)]

Additionally, attached are three (3) copies of the following studies:

MRID 45009801 Hathorn, S. III. (1999) PACE INTERNATIONAL LLC Naphthalene Acetic Acid Technical -- Product Chemistry: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, and Discussion of Formation of Impurities (OPPTS 830.1550, 830.1600, 830.1620, 830.1670): Project No. PACE-99001. (Unpublished study prepared by Pace International LLC, submitted by Pace International LLC).

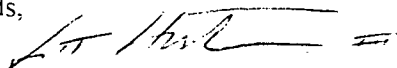
MRID 45009802 Jacobson, S.O. (1999) PACE INTERNATIONAL LLC Naphthalene Acetic Acid Technical -- Product Chemistry: Preliminary Analysis, Certified Limits and Enforcement Method(s) (OPPTS 830.1700, 830.1750, 830.1800): CSI Study No. 99003. (Unpublished study prepared by Compliance Services International, submitted by Pace International LLC).

The Application for and registration of this TGAI represent the first and most logistically critical steps toward developing and registering future end-use products that will be manufactured with this TGAI. We believe these future plant growth regulator end-use products to be beneficial tools for the growers of several minor-use crops including apples, pears, olives and various citrus. Additionally, we consider this TGAI and its forthcoming end-use products to be crucial to our goal of providing crop protection products and services that focus specifically on these minor-use markets.

Bearing all this in mind, we respectfully request an Expedited Review of this Application and would sincerely appreciate your and the BPPD's most excellent efforts to accommodate this request. Thank you in advance for your consideration.

If you have any questions about our Application or need any additional information in this regard, please call me at my direct line, 206-436-5728. Thanks again.

Best Regards,



Scott Hathorn III
Regulatory Manager

Enclosures (8)
Attachments (3 copies each of 2 studies)

cc. G. Brandli
B.Frazee
sh3NAATGAI,Sreilly,PM-91,EPA,Applic,123099
sh3Chron

INSTRUCTIONS FOR DATA MATRIX

INSTRUCTIONS: Identify all data submitted or cited and all submitters from whom permission has been received or to whom offers to pay have been sent by entering sufficient information in the attached matrix (photocopy and attach additional pages as necessary). Complete all columns; omission of essential information will delay approval of the registration/reregistration. On each page enter the date, Applicant's/Registrant's name, EPA Registration Number or application file symbol of the product, ingredient, page number, and total number of pages.

The Data Compensation Form entitled "Certification with Respect to Citation of Data" and the Data Matrix will be publicly available, except for the Guideline Reference Number, Guideline Study Name, and MRID Number columns after the registration/reregistration of this product has been granted or once this form is received in response to a Data-Call-In Notice. However, the information in the Guideline Reference Number, Guideline Study Name, and MRID Number columns is available through the Freedom of Information Act in association with the EPA Registration Number.

Ingredient: Identify the active ingredient(s) in this product for which data are cited. The active ingredient(s) are to be identified by entering the chemical name and the CAS registry number. Begin a new page for each separate active ingredient for which data are cited. If bridging data from a related chemical or representative test compound are cited, enter the identity of that chemical/representative test compound including the EPA Registration Number/File Symbol if appropriate.

If the cite-all method is used for all data supporting this particular ingredient, enter "CITE-ALL" in the Guideline Reference Number column and leave the Guideline Study Name column blank. If the cite-all method is used for a particular Guideline Reference Number enter "CITE-ALL" in the MRID Number column on the line for that Guideline Reference Number. In either case, enter all submitters to whom offers to pay have been sent on subsequent lines. [Note: if the selective method of support is used and written authorization (letter of permission) is provided, the individual Guideline Reference Number, Guideline Study Name, and MRID Number columns must still be completed.] Otherwise:

Guideline Reference Number: Enter on separate lines in numerical order the Guideline Reference Numbers from 40 CFR Part 158 for all studies cited to support the registration/reregistration for this ingredient.

Guideline Study Name: For each Guideline Reference Number cited, enter the corresponding Guideline Study Name.

MRID Number: For each individual study cited in support of a Guideline Reference Number and Guideline Study Name, enter the Master Record Identification (MRID) Number listed in the Pesticide Document Management System (PDMS). Enter only one MRID Number on each line. Note that more than one MRID Number may be required per Guideline Reference Number. Note: Occasionally a study required to maintain a registration/reregistration is not associated with a Guideline Reference Number and Guideline Study Name. In such case, enter the MRID Number(s) for the study(ies).

Submitter: Using the most recent Data Submitters List, identify the Original Data Submitter with their current address for each study cited. The EPA assigned company number or other abbreviation may be used. Clearly explain any variations (alternate addresses, data owners not on the Data Submitters List, etc.) in footnotes to this table.

Status: Enter one of the following codes for each study cited, as appropriate:

OWN: I am the Original Data Submitter for this study.

EXC: I have obtained written permission of the Original Data Submitter to cite this exclusive-use study in support of this application.

PER: I have obtained the permission of the Original Data Submitter to use this study in support of this application.

OLD: The study was submitted more than 15 years ago and all periods of compensation have expired.

PL: The study is in the public literature.

PAY: I have notified in writing the Original Data Submitter or, if the cite-all method is used, all companies listed in the most current Data Submitters List for this ingredient, and have offered (a) to pay compensation in accordance with FIFRA sections 3(c)(1)(F) and/or 3(c)(2)(B), and (b) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study(ies).

GAP: This Guideline data requirement is a data gap as defined in 40 CFR sections 152.83(a) and 152.96.

FOR: I am taking the formulator's exemption for this ingredient only. Other columns of this line should be marked "NA". However, if this product is to be registered/reregistered for additional uses for which the purchased EPA registered ingredient is not supported, additional data must be submitted or cited here to support those uses.

Note: If additional explanation is needed, enter a footnote number in this column and attach the corresponding explanation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date		EPA Reg No./File Symbol			Page of
Applicant's/Registrant's Name & Address		Product			
Ingredient					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Signature			Name and Title		Date



JLW@nwrain.com on 05/17/2000 10:44:09 AM

To: John Bazuin/DC/USEPA/US@EPA
cc:
Subject: NAA Phys/Chem MRID numbers

John,

Sorry I was unable to get connected last night, but hopefully, this morning is early enough. Thanks for meeting with me yesterday and I hope you have a great trip! Anyway, below are some MRID numbers and citations for physical/chemical characteristics that appear to support technical NAA.

00160552 Amvac Chemical Corp. (1986) [Product Chemistry of 1-Naphthalene Acetic Acid]. Unpublished compilation. 26 p.

40522903 Feiler, W. (1987) NAA: Physical and Chemical Characteristics. Unpublished study prepared by Amvac Chemical Corp. 3 p.

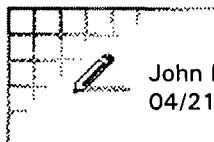
I hope this helps. Please let me know if you have any questions or need any additional information.

Thanks again and regards,

Janelle



- winmail.dat



John Bazuin
04/21/2000 09:54 AM

To: Luis Suguiyama/DC/USEPA/US,
cc:
Subject: NAA Fast Track Actions inherited from BPPD

Luis,

The Actions referred to are the ones for pending products that BPPD held and did not process, then gave to us when they transferred NAA back to us (thus, are all overdue to very overdue). These are the Actions that Janelle Whitehouse asked you for prioritization help with. Ca. April 18 I Beaned them to TRB and one of the Beans has already returned(!). However, there are 5 other Beans in TRB. I requested on each Bean that it be prioritized and indicated why. The pending Beans are:

Reg. No. 64864-LN	S578285, D265117 D265120
Reg. No. 72639-E	S578270, D265112
Reg. No. 72639-T	S578278, D265105 D265109

Could you mention these to Debbie McCall and tell her what has created the need for prioritization for them?

Thanks,

John Bazuin

N/ET

B



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

HAND DELIVERED TO:

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December 30, 1999

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MRID _____ Jacobson, S.O. (1999) PACE INTERNATIONAL LLC Naphthalene Acetic Acid Technical -- Product Chemistry: Preliminary Analysis, Certified Limits and Enforcement Method(s) (OPPTS 830.1700, 830.1750, 830.1800): CSI Study No. 99003. (Unpublished study prepared by Compliance Services International, submitted by Pace International LLC).

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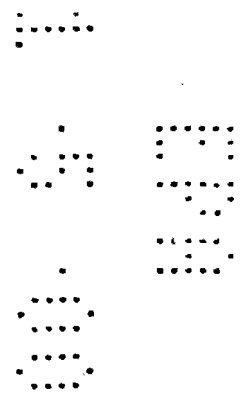
Best Regards,



Scott Hathorn III
Regulatory Manager

Enclosures (8)
Attachments (3 copies each of 2 studies)

cc. G. Brandli
B. Frazee
sh3NAATGA, Sreilly, PM-91, EPA, Applic, 123099
sh3Chron



NIFT

B

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

256645

Application for Pesticide - Section I

1. Company/Product Number <u>64864-LN</u>	2. EPA Product Manager <u>Sheryl Reilly</u> ✓	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <u>1- Naphthaleneacetic Acid Technical</u>	PM# <u>91</u> ✓	
5. Name and Address of Applicant (Include ZIP Code) <u>Pace International LLC</u> <u>1011 Western Avenue, Ste. 505</u> <u>Seattle, WA 98104</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>5481-430</u> Product Name <u>Technical Naphthaleneacetic Acid</u>

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal, Plastic Lined	<input checked="" type="checkbox"/> Plastic, Plastic Lined
Certification must be submitted If "Yes" Unit Packaging wgt. No. per container If "Yes" Package wgt No. per container				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <u>20 lb. (for MUP)</u>	5. Location of Label Directions <input checked="" type="checkbox"/> ON LABEL		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name <u>SCOTT HATHORN III</u>		Title <u>REGULATORY MGR.</u>		Telephone No. (Include Area Code) <u>206-436-5728</u>	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <u>Scott Hathorn III</u>		3. Title <u>Regulatory Manager</u>			
4. Typed Name <u>SCOTT HATHORN III</u>		5. Date <u>12/30/99</u>			

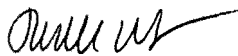
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401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date May 11, 2000			EPA Reg No./File Symbol 64864-LN		Page 1 of 3
Applicant's/Registrant's Name & Address Pace International, LLC. 1011 Western Avenue, Suite 505 Seattle, WA 98104			Product 1-Naphthaleneacetic Acid Technical		
Ingredient 1-Naphthaleneacetic Acid (NAA)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	45009801	Pace International LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	45009801	Pace International LLC	OWN	
830.1620	Description of Production Process	45009801	Pace International LLC	OWN	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	45009801	Pace International LLC	OWN	
830.1700	Preliminary Analysis	45009802	Pace International LLC	OWN	
830.1750	Certified Limits	45009802	Pace International LLC	OWN	
830.1800	Enforcement Analytical Method	45009802	Pace International LLC	OWN	
830.6302	Color		Amvac	PAY	Cite-all
830.6303	Physical State		Amvac	PAY	Cite-all
830.6304	Odor		Amvac	PAY	Cite-all
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions		Amvac	PAY	Cite-all
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not required ²
830.6315	Flammability				Not required ²
830.6316	Explosibility				Not required ²
830.6317	Storage Stability				Not required ²
Signature 			Name and Title Janelle Whitehouse, Consultant		Date 5/11/00

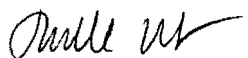
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DATA MATRIX

Date May 11, 2000			EPA Reg No./File Symbol 64864-LN		Page 2 of 3
Applicant's/Registrant's Name & Address Pace International, LLC. 1011 Western Avenue, Suite 505 Seattle, WA 98104			Product 1-Naphthaleneacetic Acid Technical		
Ingredient 1-Naphthaleneacetic Acid (NAA)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Not required ²
830.6320	Corrosion Characteristics				Not required ²
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH		Amvac	PAY	Cite-all
830.7050	UV/Visible Absorption		Amvac	PAY	Cite-all
830.7100	Viscosity				Not required ²
830.7200	Melting Point/Melting Range		Amvac	PAY	Cite-all
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density		Amvac	PAY	Cite-all
830.7370	Dissociation Constants in Water		Amvac	PAY	Cite-all
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method		Amvac	PAY	Cite-all
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method		Amvac	PAY	Cite-all
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography		Amvac	PAY	Cite-all
830.7840	Water Solubility: Column Elution Method; Shake Flask Method		Amvac	PAY	Cite-all
Signature 			Name and Title Janelle Whitehouse, Consultant		Date 5/11/00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address Pace International, LLC. 1011 Western Avenue, Suite 505 Seattle, WA 98104		Product 1-Naphthaleneacetic Acid Technical

Ingredient 1-Naphthaleneacetic Acid (NAA)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7860	Water Solubility, Generator Column Method		Amvac	PAY	Cite-all
830.7950	Vapor Pressure		Amvac	PAY	Cite-all
870.1100	Acute Oral Toxicity: Rat		Amvac	PAY	Cite-all
870.1200	Acute Dermal Toxicity: Rat		Amvac	PAY	Cite-all
870.1300	Acute Inhalation Toxicity: Rat		Amvac	PAY	Cite-all
870.2400	Primary Eye Irritation: Rabbit		Amvac	PAY	Cite-all
870.2500	Primary Dermal Irritation		Amvac	PAY	Cite-all
870.2600	Dermal Sensitization		Amvac	PAY	Cite-all

Pace made an offer-to-pay to the following company:

All - cite-all method			Amvac	PAY	

Signature 	Name and Title Janelle Whitehouse, Consultant	Date 5/11/00
--	--	-----------------

BPPD PRAT ACTION CODING FORM

rc'd 2/4/00

PM 90: Janet Andersen

REVIEWER: D. Muenweg
(ASSIGNED BY: SKR)

EPA REG./FILE SYMBOL 64864-LN

Accepted
Submission

ACTION CODE ~~675~~ 165

(NEW a.i./EUPs/Tolerances: Yes ☐ No ☐)

SUBMISSION BARCODE _____

DATE ON APPLICATION 12/30/99

EPA RECEIVED DATE 1/5/00

PM RECEIVED DATE 1/19/00

ASSIGNED IN PRAT: YES ☐ NO ☒

COMPLETED BY: T. Berthea DATE: 2/3/00

FACE INTL.
NAA tech app'l

NO PC CODE

FINAL ACTION

Response Code _____

Response Date: _____

MOS: _____ (1) Cite-All
_____ (4) Not Applicable
_____ (8) Selective

CRP: Yes ☐ No ☐

Restricted Use: Yes ☐ No ☐

Manufacturing Use: Yes ☐ No ☐

Exclusive Use: Yes ☐ No ☐



geneb@paceint.com on 04/06/2000 04:46:36 PM

To: Cynthia Giles-Parker/DC/USEPA/US@EPA, Luis Suguiyama/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
cc: JLW@nwrain.com
Subject: Thank You

I just wanted to thank each of you for spending time with Janelle Whitehouse, Pace's representative and regulatory consultant for our NAA tech and KNAA end-use products.

I appreciate your sensitivity to our tight timetable and your willingness to process our registrations in as timely a manner as possible.

Thank you.

Gene Brandli, Dir. of Regulatory Affairs
Pace Int'l LLC



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

March 23, 2000

Ms. Cynthia Giles-Parker
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505C)
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Letter of Authorization

Dear Ms. Giles-Parker,

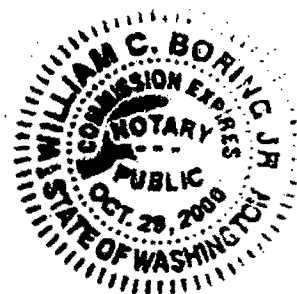
Please let this letter serve to notify you that Pyxis Regulatory Consulting is authorized to represent Pace International, LLC. (Company Number 64864) before the US Environmental Protection Agency in all matters regarding our registrations and applications for registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 USC Section 136 et seq.

If you have any questions, please do not hesitate to contact me.

Sincerely,


Gene Brandli
Director, Product Development and Regulatory Affairs

cc: Janelle Whitehouse, Pyxis Regulatory Consulting



Sworn to before me
This 23 day of March, 2000.

William C. Borning, Jr.

At Seattle, Washington

My notary expires on 10/29/2000.

1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

March 23, 2000

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US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505C)
Ariel Rios Building
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At Seattle, Washington

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450098-00

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Arlington, VA 22202

December 30, 1999

Ms. Sheryl Reilly, Acting Chief & Product Manager (PM-91)
Biochemicals Pesticides Branch
Biopesticides and Pollution Prevention Division (BPPD)

**RE: Application for Section 3 Registration of:
1-Naphthaleneacetic Acid Technical (TGAI/MUP)**

Dear Ms. Reilly:

Enclosed in support of our proposed registration of 1-Naphthaleneacetic Acid Technical (TGAI/MUP), a biochemical plant growth regulator, are the following:

- EPA Application for Pesticide Registration [Form 8570-1 (Rev. 3-94)]
- Five (5) copies of pour draft labeling
- Confidential Statement of Formula [Form 8570-4 (Rev. 8-94)]
- Certification of Accuracy of Product Certified Limits
- Certification with Respect to Citation of Data [Form 8570-34 (9-97)]
- Copy of PACE's Offer to Pay Letter to the only company listed on EPA's Data Submitter's List ((9/30/99) for 1-Naphthaleneacetic Acid Technical
- Data Matrix, Public File Copy [Form 8570-35 (9-97)]
- Data Matrix, Agency Internal Use Copy [Form 8570-35 (9-97)]

Additionally, attached are three (3) copies of each of the following studies:

MRID 45009801 Hathorn, S. III. (1999) PACE INTERNATIONAL LLC Naphthalene Acetic Acid Technical -- Product Chemistry: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, and Discussion of Formation of Impurities (OPPTS 830.1550, 830.1600, 830.1620, 830.1670): Project No. PACE-99001. (Unpublished study prepared by Pace International LLC, submitted by Pace International LLC).

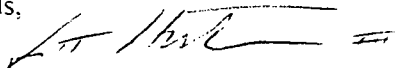
MRID 45009802 Jacobson, S.O. (1999) PACE INTERNATIONAL LLC Naphthalene Acetic Acid Technical -- Product Chemistry: Preliminary Analysis, Certified Limits and Enforcement Method(s) (OPPTS 830.1700, 830.1750, 830.1800): CSI Study No. 99003. (Unpublished study prepared by Compliance Services International, submitted by Pace International LLC).

The Application for and registration of this TGAI represent the first and most logistically critical steps toward developing and registering future end-use products that will be manufactured with this TGAI. We believe these future plant growth regulator end-use products to be beneficial tools for the growers of several minor-use crops including apples, pears, olives and various citrus. Additionally, we consider this TGAI and its forthcoming end-use products to be crucial to our goal of providing crop protection products and services that focus specifically on these minor-use markets.

Bearing all this in mind, we respectfully request an Expedited Review of this Application and would sincerely appreciate your and the BPPD's most excellent efforts to accommodate this request. Thank you in advance for your consideration.

If you have any questions about our Application or need any additional information in this regard, please call me at my direct line, 206-436-5728. Thanks again.

Best Regards,



Scott Hathorn III
Regulatory Manager

Enclosures (8)
Attachments (3 copies each of 2 studies)

cc. G. Brandli
B.Frazee
sh3NAATGAI,Sreilly,PM-91,EPA,Applic,123099
sh3Chron

PESTICIDE REGISTRATION ACTION TRACKING SYSTEM (PRATS) CODING FORM

BAR CODE: 5578285 ID NUMBER: 64864-LN ACTION CODE: 160

PM: 22 REVIEWER: Bazuin DUE DATE: 4 / 5 / 2000

DATE ON APPLICATION: 12 / 30 / 99

EPA RECEIVED DATE: 1 / 5 / 2000

PM RECEIVED DATE: 3 / 15 / 2000

APPLICANT: Pace International (Pyxis Reg. Consulting; Jan-
nelle Whitehouse later became their agent)

CHEM CODE (1): 056002 CHEM: 1-Naphthaleneacetic Acid ~~179~~ (99.0%)

CHEM CODE (2): _____ CHEM: _____

DESCRIPTOR: MUP; Acute Tox. is "me-tooing" on
5481-430

DATA REVIEWS:

HED: RCAB _____ TB _____ RCB _____ DRES _____

OREB _____

EFED: IO _____ EEB _____ EFGWB _____ ERCB _____

BEAD: ACB _____ BAB _____ EAB _____

RSB: PCRS _____ PRS _____ PCS _____

PM Team: Carl _____ Paul _____ Vern _____ Bill _____

FINAL ACTION: RESPONSE CODE: _____ RESPONSE DATE: ____/____/____

75-DAY RESPONSE: YES _____ NO _____ MOS: (1) CITE ALL

CRP: YES _____ NO _____ (4) NOT APPLICABLE

RESTRICTED USE: YES _____ NO _____ (8) SELECTIVE

EXCLUSIVE USE: YES _____ NO _____

MANUFACTURING USE: YES _____ NO _____

CONDITIONAL REGISTRATION/UNCONDITIONAL REGISTRATION

NOTES: _____

Endnotes for Data Matrix for Pace's 1-Naphthaleneacetic Acid Technical

¹ **830.1650** - Per OPPTS 830.1000, these data are not required for the registration of a technical product. See 830.1620 for production process information.

² **830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, and 830.7100** - Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient.

³ **830.7220** - Boiling point data are only required for liquids. 1-Naphthaleneacetic acid is a solid.

JAN 18 2000

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

PACE INTERNATIONAL LLC
1011 WESTERN AVENUE, SUITE 505
SEATTLE, WA 98104

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 01/05/00. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

NIFT

B

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

256645

Application for Pesticide - Section I

1. Company/Product Number 64864-LN	2. EPA Product Manager Sheryl Reilly ✓	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 1- Naphthaleneacetic Acid Technical	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Pace International LLC 1011 Western Avenue, Ste. 505 Seattle, WA 98104 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 5481-430 Product Name Technical Naphthaleneacetic Acid	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal, Plastic Lined	Plastic Lined
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Plastic	Plastic Lined
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 20 lb. (for MWP)		5. Location of Label Directions <input checked="" type="checkbox"/> ON LABEL	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name SCOTT HATHORN III	Title REGULATORY MGR.	Telephone No. (Include Area Code) 206-436-5728
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature Scott Hathorn III	3. Title Regulatory Manager	
4. Typed Name SCOTT HATHORN III	5. Date 12/30/99	

N/FT

B



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

HAND DELIVERED TO:

Document Processing Desk (7504C) – (APPL)
Office of Pesticide Programs
U.S. ENVIRONMENTAL PROTECTION AGENCY
Crystal Mall Building II
1921 Jefferson Davis Highway, Room 266-A
Arlington, VA 22202

December 30, 1999

Ms. Sheryl Reilly, Acting Chief & Product Manager (PM-91)
Biochemicals Pesticides Branch
Biopesticides and Pollution Prevention Division (BPPD)

**RE: Application for Section 3 Registration of:
1-Naphthaleneacetic Acid Technical (TGAI/MUP)**

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If you have any questions about our Application or need any additional information in this regard, please call me at my direct line, 206-436-5728. Thanks again.

Best Regards,



Scott Hathorn III
Regulatory Manager

Enclosures (8)
Attachments (3 copies each of 2 studies)

cc. G. Brandli
B. Frazee
sh3NAATGAI, Sreilly, PM-91, EPA, Applic, 123099
sh3Chron

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1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

CERTIFICATION OF ACCURACY OF CERTIFIED LIMITS

1-Naphthaleneacetic Acid Technical (TGAI/MUP) EPA Reg. No. 46864- LN

I hereby certify that for purposes of FIFRA section 12(a)(1)(C), the description of the composition of 1-Naphthaleneacetic Acid Technical, EPA Reg. No. 46864- , refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representations that: No ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit (if required) specified for that ingredient in a currently-approved Confidential Statement of Formula. To that end, if the U.S. Environmental Protection Agency requires that the source of supply of an ingredient be specified, all quantities of that ingredient will be obtained from the source specified on the Confidential Statement of Formula.



Scott Hathorn III
Regulatory Manager
Pace Ingternational LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104

12/29/99
Date

cc. sh3NAA,TGAI,CSF & CertLimitsState,CertOfCertLimits,122999
sh3chron

DATE 1/6/00FILE NUMBER 64864-LN

 No Data - File Room "Make Ready for "
(PM or Individual)

✓ Data - File Room "Assign Jacket to Shelf"

 Rejected - File Room "Assign Jacket to Rejected Shelf"

FRONT END PROCESSING APPLICATION INFORMATION CHECK

DATE: 1/6/2000

PM 91

EPA COMPANY NUMBER 64864-LN

EPA REGISTRATION NUMBER
STATUS (For Amendments)

Active _____ Cancelled _____

Not in REFS _____

"Me-Too" CITED PRODUCT STATUS

Active _____ Cancelled _____

Not in REFS _____

PRAT RECORD CREATED yes - 1/6/2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 6, 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PACE International, LLC
1011 Western Avenue, #505
Seattle, WA 98104

PRODUCT NAME: 1-Naphthaleneacetic, Acid Technical
COMPANY NAME: Pace International, LLC
OPP IDENTIFICATION NUMBER: 256645
EPA FILE SYMBOL: 64864-LN
EPA RECEIPT DATE: 01/06/2000

SUBJECT: RECEIPT OF APPLICATION FOR A NEW REGISTRATION

DEAR REGISTRANT:

The Office of Pesticides Programs has received your application for a new registration and it has passed an administrative screen for completeness.

Please note that this is only a notification of receipt of your application. This is only the first step in the application process, and does NOT constitute approval.

If you have any questions please contact Sheryl Reilly, Product Manager 91, at (703)-308-8269.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Jones".

Front End Processing Staff
Information Services Branch
Information Resources & Services Division

N/FT

B



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

HAND DELIVERED TO:

Document Processing Desk (7504C) – (APPL)
Office of Pesticide Programs
U.S. ENVIRONMENTAL PROTECTION AGENCY
Crystal Mall Building II
1921 Jefferson Davis Highway, Room 266-A
Arlington, VA 22202

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Best Regards,



Scott Hathorn III
Regulatory Manager

Enclosures (8)
Attachments (3 copies each of 2 studies)

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B.Frazee
sh3NAATGAI,Sreilly,PM-91,EPA,Applic,123099
sh3Chron

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1011 Western Avenue
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Seattle, WA 98104
206.264.7599
Fax 206.436.5808

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Scott Hathorn III
Regulatory Manager
Pace International LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104

12/29/99
Date

cc. sh3NAA,TGAI,CSF & CertLimitsState,CertOfCertLimits,122999
sh3chron

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B

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



256645

Yellow - Applicant Copy

Form Approved OMB No. 2070-0060

ates

tion Agency

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☐
☐
☐

Registration
Amendment
Other

OPP Identifier Number

256645

• Pesticide - Section I

2. EPA Product Manager

3. Proposed Classification

☐

None

☐

Restricted

• Review. In accordance with FIFRA Section 3(c)(3)
• is similar or identical in composition and labeling

PAPERWORK REDUCTION ACT NOTICE

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this response, including time for reviewing instructions, searching existing data sources, gathering the necessary information, reviewing the collection of information, sending comments regarding the burden or suggestions for reducing this burden, to Chief, Information Policy Branch, (215) 904-0044, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for registration, final printed labeling, reregistration, etc. In order for the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 870-1)
2. Confidential Statement of Formula (EPA Form 870-2)
3. Formulator's Exemption Statement (EPA Form 870-3)
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should be in the form of typed label text on 8 1/2 x 11 inch paper for submission.

Submission of Data - Data should be in the form of typed label text on 8 1/2 x 11 inch paper for submission.

SPECIFIC INSTRUCTIONS

action, listed in
I, III, and IV
notification
Block

Form Approved OMB No. 2070-0060

Agency

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

256645

Pesticide - Section I

1. EPA Product Manager

3. Proposed Classification

☐

None

☐

Restricted

Review. In accordance with FIFRA Section 3(c)(3)
is similar or identical in composition and labeling

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6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should be in the form of typed label text on paper constructed in a way as to facilitate use on 11 inch paper for submission.
Submission of Data - Data

SPECIFIC INSTRUCTIONS

action, listed in sections I, III, and IV of the notification.
Block



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Pace International, LLC; 1011 Western Ave. Ste 505; Seattle, WA 98104	EPA Registration Number/File Symbol 64864- 2A 50
Active Ingredient(s) and/or representative test compound(s) 1-Naphthaleneacetic Acid (NAA)	Date 12/29/99
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGAI; Terrestrial Crop/Noncrop	Product Name Technical 1-Naphthaleneacetic Acid

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27). 5A3 12/29/99

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

- ☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).
- ☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

12/29/99

Typed or Printed Name and Title

SCOTT HATHORN
REGULATORY MANAGER



1011 Western Avenue
Suite 505
Seattle, WA 98104
206.264.7599
Fax 206.436.5808

CERTIFIED/RETURN RECEIPT MAIL

December 30, 1999

Dr. Jon Wood
Amvac Chemical Corporation
2110 Davie Avenue
Commerce, CA 90040-1706

RE: Data Compensation Offer To Pay: 1-Naphthaleneacetic Acid

Dear Dr. Wood:

Pace International LLC (Pace) hereby notifies you that it intends to apply for registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) of Technical 1-Naphthaleneacetic Acid. This product contains the active ingredient 1-naphthaleneacetic acid (NAA).

In accordance with 40 C.F.R. § 152.86, Pace hereby offers to pay compensation to Amvac Chemical Company to the extent required by FIFRA Section 3(c)(1)(F) for data on which our application relies. Pace also offers to commence negotiations with Amvac to determine the amount and terms of compensation, if any, to be paid.

Please direct your response to this letter to the undersigned, at the address shown on the letterhead. If we have not heard from you within sixty days, we will understand that Amvac waives any right to data compensation.

Thank you for your consideration.

Sincerely,

Scott Hathorn III
Regulatory Manager

cc. G. Brandli
B. Frazee
sh3NAA TGAI, CiteAllOTPletter, 122099
sh3chron

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date December 29, 1999		EPA Reg No./File Symbol 64864- <i>LN</i>		Page 1 of 1	
Applicant's/Registrant's Name & Address Pace International, LLC. 1011 Western Avenue, Suite 505 Seattle, WA 98104		Product 1-Naphthaleneacetic Acid Technical			
Ingredient 1-Naphthaleneacetic Acid (NAA)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition		Pace International LLC	OWN	
830.1600	Description of Materials Used to Produce the Product		Pace International LLC	OWN	
830.1620	Description of the Production Process		Pace International LLC	OWN	
830.1650	Description of the Formulation Process		Pace International LLC	OWN	
830.1670	Discussion of Formation of Impurities		Pace International LLC	OWN	
830.1700	Preliminary Analysis		Pace International LLC	OWN	
830.1750	Certified Limits		Pace International LLC	OWN	
830.1800	Enforcement Analytical Method		Pace International LLC	OWN	
Signature 			Name and Title <i>SCOTT HATHORN III</i> REGULATORY MANAGER		Date 12/29/99

83-86 Confidential Statement of Formula may be entitled to confidential treatment

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CERTIFICATION OF ACCURACY OF CERTIFIED LIMITS

1-Naphthaleneacetic Acid Technical (TGAI/MUP) EPA Reg. No. 46864- LN

I hereby certify that for purposes of FIFRA section 12(a)(1)(C), the description of the composition of 1-Naphthaleneacetic Acid Technical, EPA Reg. No. 46864- , refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representations that: No ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit (if required) specified for that ingredient in a currently-approved Confidential Statement of Formula. To that end, if the U.S. Environmental Protection Agency requires that the source of supply of an ingredient be specified, all quantities of that ingredient will be obtained from the source specified on the Confidential Statement of Formula.



Scott Hathorn III
Regulatory Manager
Pace International LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104

12/29/99
Date

cc. sh3NAA,TGAI,CSF & CertLimitsState,CertOfCertLimits,122999
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